

Approved: Alexandra Rothman  
ALEXANDRA N. ROTHMAN  
Assistant United States Attorney

Before: THE HONORABLE KATHARINE H. PARKER  
United States Magistrate Judge  
Southern District of New York

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UNITED STATES OF AMERICA	:	<u>COMPLAINT</u>
- v. -	:	Violations of 18 U.S.C.
	:	§§ 1001 and 1071
GRANT GRANDISON,	:	
	:	COUNTY OF OFFENSE:
Defendant.	:	BRONX

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SOUTHERN DISTRICT OF NEW YORK, ss.:

GARY HABER, being duly sworn, deposes and says that he is a Detective with the New York City Police Department and Task Force Officer with the United States Attorney's Office for the Southern District of New York, and charges as follows:

COUNT ONE

1. On or about December 4, 2020, in the Southern District of New York, GRANT GRANDISON, the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully falsified, concealed, and covered up material facts by trick, scheme, and device, and made materially false, fictitious, and fraudulent statements and representations, to wit, GRANDISON falsely told Deputy United States Marshals that Andre K. Sterling, a fugitive wanted by law enforcement for a shooting, was not present when the Deputy United States Marshals attempted to arrest Sterling.

(Title 18, United States Code, Section 1001(a).)

COUNT TWO

2. On or about December 4, 2020, in the Southern District of New York, GRANT GRANDISON, the defendant, harbored and concealed Andre K. Sterling, a person for whose arrest a warrant and process had been issued under the provisions of a law of the United States,

so as to prevent the discovery and arrest of Sterling, after notice and knowledge of the fact that a warrant and process had been issued for the apprehension of Sterling, and which warrant had been issued on a felony charge, to wit, GRANDISON allowed Sterling to reside in his apartment after learning that Sterling was wanted by law enforcement for a shooting.

(Title 18, United States Code, Section 1071.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

3. I am a Detective with the New York City Police Department, and a Task Force Officer with the United States Attorney's Office for the Southern District of New York. I have been personally involved in the investigation of this matter. I base this affidavit on that personal experience, as well as on my conversations with other law enforcement officers and witnesses, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. Based on my involvement in this investigation, my conversations with other law enforcement officers, and my review of law enforcement reports and court records, I have learned the following, among other things:

a. On or about November 20, 2020, Andre K. Sterling allegedly shot a Massachusetts State Trooper during a traffic stop in Hyannis, Massachusetts. Sterling fled from Massachusetts and was deemed a fugitive.

b. On or about November 24, 2020, Sterling was charged by Complaint, 20-MJ-5448 (JGD), in the District of Massachusetts with unlawful flight to avoid prosecution, in violation of 18 U.S.C. § 1073. A warrant was issued for Sterling's arrest.

c. On or about December 4, 2020, at approximately 5:30 a.m., several Deputy United States Marshals (the "Marshals"), along with officers from the New York City Police Department and state troopers from the Massachusetts State

Police, traveled to an apartment in the Bronx (the "Apartment") where they believed that Sterling was located in order to arrest Sterling.

d. The Marshals announced themselves as "U.S. Marshals" and encountered GRANT GRANDISON, the defendant, at the door to the Apartment.

e. The Marshals asked GRANDISON, in sum and substance, if anyone else was in the Apartment, and GRANDISON replied, in sum and substance, that no one else was in the Apartment.

f. The Marshals proceeded into the Apartment, at which point an individual, later identified as Sterling, began firing at the Marshals, striking and injuring two Marshals. The Marshals returned fire, and Sterling was killed in the exchange that followed. Law enforcement agents recovered a firearm from near Sterling.

g. GRANDISON was transported to the hospital and then to the 47th Precinct, where he was advised of his Miranda rights, and agreed to waive those rights and speak with law enforcement (the "Interview").

5. Based on my participation in the Interview with GRANT GRANDISON, the defendant, I have learned the following, among other things:

a. GRANDISON first met Andre K. Sterling in or around 2005. They have remained friends ever since.

b. GRANDISON lived in the Apartment. In or around November 2020, around the time of Thanksgiving, Sterling arrived at the Apartment from Boston and asked to stay with GRANDISON. GRANDISON agreed to let Sterling stay with him.

c. At some point following his arrival at the Apartment, Sterling told GRANDISON, in sum and substance and among other things, that if anyone was looking for Sterling, GRANDISON should tell them that Sterling was not there.

d. Sterling further told GRANDISON, in sum and substance and among other things, that Sterling needed help getting a car (the "Car") back to Massachusetts. GRANDISON recruited an individual ("Individual-1") to drive the Car to Massachusetts. See *infra* ¶ 6(a)-(b).

e. Individual-1 was arrested while driving the Car to Massachusetts. GRANDISON traveled to Boston to bail Individual-1 out of jail, and bring Individual-1 back to New York.

f. GRANDISON returned to the Apartment and confronted Sterling about the Car, but allowed Sterling to remain in the Apartment.

6. Based on my involvement in this investigation, including my participation in an interview with Individual-1, I have learned the following, among other things:

a. In or around late November 2020, Individual-1 agreed to drive the Car from New York to Massachusetts at the request of GRANT GRANDINSON, the defendant.

b. While driving to Massachusetts, Individual-1 was pulled over by law enforcement officers, and informed, in sum and substance and among other things, that the Car was stolen. Individual-1 was placed under arrest.

c. Individual-1 appeared in Massachusetts state court following the arrest. During the court appearance, Individual was further informed, in sum and substance and among other things, that the Car had been previously used by Andre K. Sterling, who was wanted by law enforcement for the shooting of a state trooper. GRANDISON was present in the courtroom at the time, and heard that Sterling was wanted by law enforcement for a shooting.

7. Based on my involvement in this investigation, including my interviews with GRANT GRANDISON, the defendant, and Individual-1, I believe that GRANDISON knew that Sterling was wanted by law enforcement for a shooting, and yet GRANDISON continued to harbor or conceal Sterling in the Apartment. I further believe that GRANDISON knowingly and willfully lied to the Marshals when GRANDISON told the Marshals, in sum and substance, that no one else was in the Apartment, when the Marshals arrived at the Apartment to arrest Sterling.

WHEREFORE, deponent respectfully requests that GRANT GRANDISON, the defendant, be imprisoned or bailed as the case may be.

/s/ Gary Haber

GARY HABER  
Detective  
New York City Police Department  
Task Force Officer  
United States Attorney's Office,  
Southern District of New York

Sworn to me through the transmission of this  
Affidavit by reliable electronic means,  
pursuant to Federal Rules of Criminal Procedure  
41(d)(3) and 4.1, this 5th day of December, 2020

Katharine H Parker

THE HONORABLE KATHARINE H. PARKER  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK